

To: The Honourable Tony Clement, MP Parry Sound - Muskoka; Minister of Industry Canada
Wayne Smith, Assistant Chief Statistician; Statistics Canada
Janet Sears, Ombudsman; Statistics Canada

From: Chris Bowes, Research and Policy Analyst; North Bay Parry Sound District Health Unit
David Plumstead, Research Analyst; District of Nipissing Social Services Admin. Board

Date: July 23, 2010

Re: Issue Brief: Change to 2011 Census Methodology

The Issue /Policy Implication

The federal government is changing the Statistics Canada census methodology for the 2011 census by eliminating the mandatory long form (Form 2-B). This mandatory form would be replaced by a voluntary household survey. This change will negatively impact municipal research, planning, and policy development in key sectors such as health, education, labour force development, housing, early learning and childcare, human services, and social and economic development.

Municipal research is often undertaken to support the delivery of new government programs and services (municipal, provincial, and federal) and/or make improvements to existing programs and services. Thus people living in local communities and municipalities who benefit from this research through improved services and programs stand to be impacted the most.

The Recommendation

We are recommending the federal government reverse its decision to replace the 2011 mandatory long-form census questionnaire with the voluntary long-form household survey (option #1, p. 3).

Background

Statistics Canada is the national statistical agency that provides statistics for Canada. The agency was formed in 1918 as the Dominion Bureau of Statistics (changed to Statistics Canada in 1971). The national agency conducts the Canadian census every five years and also conducts numerous other surveys in Canada. The census data that is compiled by Statistics Canada is extensive, as is the number of people and agencies who use the data.

Statistics Canada is one of the 11 federal departments and agencies in the Industry Canada portfolio. The agency is legislated under the Statistics Act to provide statistics for Canada and the provinces and territories. The census mandate is also governed by the Statistics Act, and census data is collected under the authority of more than 80 pieces of legislation. By law, Canadian households are required to complete the census questionnaire (the short-form is sent out to approximately 80% of Canada's households and the long-form is sent to 20% of the households) and Statistics Canada is required to protect the confidentiality of census and survey participants. To ensure it meets this legal requirement, the personal information collected by Statistics Canada is protected under the Privacy Act. Additionally, the agency employs stringent safeguards around how the data is collected, analyzed, and disseminated.

In response to privacy concerns from some Canadians, the federal government is changing the Statistics Canada census methodology for the 2011 census. This change involves discontinuing the mandatory long-form census questionnaire and replacing it with a voluntary household survey. Both of these methods involve surveying a sample of Canadian households.¹

From a municipal research perspective, moving from a mandatory census questionnaire to a voluntary household survey creates concerns related to survey sample bias, data quality concerns, data interpretation issues, inability to conduct cross-sectional and time series analysis, disruption or possible termination of

¹ The current (mandatory) census long-form has a sample size of 20% Canadian households while the new (voluntary) household survey long-form will have a sample size of 33% of Canadian households.

longitudinal studies that are presently underway, benchmarking concerns, and issues of availability of data at the lowest levels of geography.

While it is understood that the government is responding to privacy concerns, the manner in which it is doing so is questionable. The change in census methodology has the potential to negatively impact research efforts in many different sectors across the country. This in turn puts the quality of many programs and services that Canadians rely on at risk.

While the above offers the municipal-level perspective, the federal government may want to look inward at the impacts the census change will have on its own policies and planning. For example, a strong argument can be made that a change to census methodology could undermine the main areas under the federal industry portfolio itself, namely competitiveness, innovation, sectoral strategies, and economic development for Northern Ontario. These portfolios require evidenced-based, objective planning and decision making to achieve desired outcomes. Census data is central to this planning and decision-making, thus a change in census methodology puts the quality of this planning at risk.

The changes to the census also contradict the federal government's very goal of "building a knowledge-based economy in all regions of Canada and advancing the government's jobs and growth agenda". To achieve this goal, the federal government will need to utilize the best data available. "Advancing the jobs and growth agenda" requires industry and labour market research that will inform the government's policies and plans. Invariably this research will need to include cross-sectional and time series analysis of census data. This stands to be lost with the change in census methodology as the analysis will no longer be comparing "apples to apples".

Analysis

If the decision to make this change was based on evidence or an objective, systematic evaluation, it might be more understandable. However, the evidence supporting the federal government's changes to the census itself is still largely unanswered. This lack of transparency in decision-making raises the question of how the decision to make the census change was reached. It appears the decision has not been backed with objective, statistical evidence or a sound business case or evaluation.

The following offers a simple framework for analyzing the merits of changing the census methodology to address concerns:

1. The Privacy Act

Census-related privacy concerns have been present for 40 years or more. It was due to these same concerns that the Dominion Bureau of Statistics (now Statistics Canada) moved from an interviewer format to self-enumeration for the 1971 census (itself a significant change in survey methodology). However, Canada now has a Privacy Commissioner whose mission is to "protect and promote the privacy rights of individuals". Under the Privacy Act, the privacy concerns of Canadians should be brought to the Privacy Commissioner for further investigation. This is a logical starting place for addressing census-related privacy concerns: let the Privacy Commissioner perform an investigation into census privacy complaints and make recommendations based on the findings. It is unclear as to whether or not this avenue was pursued by the government prior to making the census change. If so, no evidence of this has been presented. If not, then changing the country's statistical model before exploring other more appropriate and direct avenues such as this, is inappropriate.

2. Public Consultation

In an era where public consultation is a prerequisite for most government program and policy changes, the consultations were notably absent in this change process. The federal government announced the census change suddenly and without any prior consultation with the public. Had public consultations been held, the outcome would look very different, as voices of on both sides would have been able to participate in the dialogue prior to a decision being made. As the situation currently stands, the dialogue is now only happening after the decision has been announced.

Options

Based on the background and analysis above, the following are options for the government to consider. This is not an exhaustive list but rather, one that offers pragmatic choices given the situation as outlined above, and the tight timelines (census planning is well underway as the next census is in May 2011).

Option # 1

Reverse the government's decision to make the changes to the long-form census methodology and return to the status quo for 2011 Census. While this will satisfy most researchers and analysts, it will not satisfy the citizens who are concerned that their privacy rights are being violated. In response to this later group, start by addressing their concerns through the proper established channels which presumably starts with the Privacy Commissioner under the Privacy Act. This option addresses those with privacy concerns while also keeping the current census data intact.

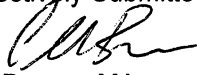
Option # 2

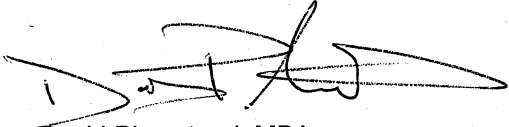
Reverse the government's decision to make the changes to the long-form census methodology and return to the status quo for 2011 Census. After this census period, re-evaluate the situation through the acceptable channels, i.e. by conducting public consultations and involving the Privacy Commissioner. The outcomes of these evaluation activities will determine any changes that may – or may not – be necessary for subsequent censuses, beginning in 2016.

Community Impact

The organizations that have signed on to this letter are also submitting individual letters from their organizations explaining how this change will affect the work they do. However, we also feel it is important to submit a joint letter to help the government understand the coordinated work that is done by these organizations at a community level, and how the long-form census is critical to this work. If the proposed changes are not reversed, the integrity of community-based planning and research that is currently being done will be compromised. In the interest of accountability and transparency, it is important that the people who are impacted by decisions be given the opportunity to participate in the dialogue.

Respectively Submitted,


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